

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PETRÓLEOS DE VENEZUELA, S.A., PDVSA
PETRÓLEO, S.A., and PDV HOLDING, INC.,

Plaintiffs and Counterclaim Defendants,

- against -

MUFG UNION BANK, N.A. and GLAS
AMERICAS LLC,

Defendants and Counterclaim Plaintiffs.

No. 19 Civ. 10023 (KPF)

NOTICE AND [PROPOSED] ORDER TO WITHDRAW AS COUNSEL

PLEASE TAKE NOTICE that upon the accompanying declaration of Shane D. Avidan, and subject to the approval of the Court, Shane D. Avidan hereby withdraws as counsel for MUFG Union Bank, N.A. and GLAS Americas LLC and shall be removed from the Case Management/Electronic Case Files (CM/ECF) notification list in the above-captioned matter. MUFG Union Bank, N.A. and GLAS Americas LLC will continue to be represented by Paul, Weiss, Rifkind, Wharton & Garrison LLP and Latham & Watkins LLP in this proceeding.

Dated: New York, New York
July 14, 2023

**PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP**

By: /s/ Shane D. Avidan
Shane D. Avidan
1285 Avenue of the Americas
New York, NY 10019-6064
Tel: (212) 373-3476
Fax: (212) 492-0476
savidan@paulweiss.com

*Attorney for Defendants and Counterclaim
Plaintiffs MUFG Union Bank, N.A. and GLAS*

*Americas LLC, in their respective capacities as
Trustee and Collateral Agent under the Indenture
dated October 27, 2016, and the Pledge and
Security Agreement dated October 28, 2016,
governing PDVSA's Senior Secured Notes due 2020
(as to Federal and New York law issues only)*

SO ORDERED:

U.S.D.J.

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SOUTHERN DISTRICT OF NEW YORK**

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PETRÓLEO, S.A., and PDV HOLDING, INC.,

Plaintiffs and Counterclaim Defendants,

- against -

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AMERICAS LLC,

Defendants and Counterclaim Plaintiffs.

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DECLARATION OF SHANE D. AVIDAN

1. I am an associate at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, counsel for MUFG Union Bank, N.A. and GLAS Americas LLC. I submit this declaration in compliance with Local Rule 1.4 to notify the Court that I am seeking to withdraw as counsel because, as of July 14, 2023, I will no longer be associated with Paul, Weiss, Rifkind, Wharton & Garrison LLP.

2. Paul, Weiss, Rifkind, Wharton & Garrison LLP and Latham & Watkins LLP will continue to represent MUFG Union Bank, N.A. and GLAS Americas LLC in this proceeding.

3. In my opinion, my withdrawal will not delay the matter or prejudice any party.

4. I am not retaining a charging lien.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 14, 2023

/s/ Shane D. Avidan

Shane D. Avidan

CERTIFICATE OF SERVICE

I hereby certify that, on July 14, 2023, I caused a true and correct copy of the foregoing to be served upon all parties to this litigation via the CM/ECF system and upon MUFG Union Bank, N.A. and GLAS Americas LLC via e-mail.

Dated: July 14, 2023

/s/ Shane D. Avidan

Shane D. Avidan